

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

FILED

DEC 20 2021

Mark C. McCartt, Clerk
U.S. DISTRICT COURTMarcus Lee

Plaintiff(s)

vs.

Case Number:

21 CV - 551 CVE JFJKenneth W. Hagin; Rhema Bible Training College

Defendant(s)

COMPLAINT

☒ Mail ☐ No Cert Svc ☐ No Orig Sign
☐ C/J ☐ C/MJ ☐ C/Ret'd ☐ N/A
☐ No Cpy's ☒ No Env/Cpy's ☐ J ☐ D/MJ

A. Parties

- 1) Marcus Lee, is a citizen of Michigan
 (Plaintiff) (State)
 who presently resides at 20771 Halsted Rd. Northville, MI 48167
 (mailing address if different from residence)
- 2) Defendant Kenneth W. Hagin is a citizen of Broken Arrow, Oklahoma
 (Name of first defendant) (City, State)
 and is employed as Pastor
 (Position and title, if any)
- 3) Defendant Rhema Bible Training College is a citizen of Broken Arrow, Oklahoma
 (Name of second defendant) (City, State)
 and is employed as N/A
 (Position and title, if any)

[You may attach additional pages (8½" x 11") to furnish the above information for additional defendants.]

B. Jurisdiction

- 1) Jurisdiction is asserted pursuant to:
Diversity of citizenship and requested relief in excess of \$75,000.

C. Nature of Case

- 1) Briefly state the background of your case:
While a student of Rhema Bible Training College in 2013 defendants disseminated among other students
and staff that I had contagious demons, thereby endangering my life, causing me emotional distress, and
ruining my reputation.

D. Cause of Action

I allege the following:

1. Negligence -defendants owe a duty to maintain the safety and wellbeing of their students, or at least not to

IFP Pending

endanger them.

Supporting Facts: (Include all facts you consider important, including names of persons involved, places and dates. Describe exactly how each defendant is involved. State the facts clearly in your own words without citing legal authority or argument.)

One student, with whom I stayed, was so upset when he heard the accusations that he sent people out after me to do me harm. I had to move out in a hurry and I was literally chased out of town. I ran to campus safety

2. Defamation/ slander

Supporting Facts: (Include all facts you consider important, including names of persons involved, places and dates. Describe exactly how each defendant is involved. State the facts clearly in your own words without citing legal authority or argument.)

Other students at the school and parishioners at the church began treating me strangely, including Rev. Hagir and Ms. Lynette Hagin, his wife. I was embarrassed.

3. _____

Supporting Facts: (Include all facts you consider important, including names of persons involved, places and dates. Describe exactly how each defendant is involved. State the facts clearly in your own words without citing legal authority or argument.)

[If necessary, you may attach additional pages (8½" x 11") to explain any allegation or to list additional supporting facts in the same format as above.]

E. Request for Relief

I believe that I am entitled to the following relief:

\$15,000,000.00


Original Signature of Plaintiff

Current Address

20771 Halsted Rd.

City

Northville, MI 48167

State

ZIP

Telephone

(248) 798-7744

Marcus Lee
20771 Halsted Rd.
Northville, MI 48167



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Mark C. MacCormack
U.S. DISTRICT COURT

